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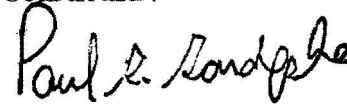
January 26, 2021

VIA ECF

Memo Endorsed: This application is granted. The conference currently scheduled for February 4, 2021 is adjourned to April 1, 2021 at 9:15 a.m.

SO ORDERED.

Honorable Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1105
New York, New York 10007



Paul G. Gardephe
United States District Judge
Dated: January 29, 2021

Re: *A.W., individually and on behalf of J.W., a child with a disability, v. New York City Department of Education, 20-CV-07645 (PGG)*

Dear Judge Gardephe,

I write on behalf of Defendant Department of Education (“DOE”) in the above-referenced matter, wherein Plaintiffs seek attorneys’ fees and related costs following an administrative hearing under the Individuals with Disabilities Education Act (“IDEA”), 20 U.S.C. § 1400, *et seq.* I write respectfully to request a 30-day extension of Defendant’s time to answer the Complaint.

The Complaint was initially filed on September 17, 2020, and thereafter served on Defendant on September 18, making Defendant’s answer due on October 8, 2020. The Court has since granted three extensions of the time to Answer, with the consent of Plaintiff’s counsel.

This firm has taken over the representation of DOE, and as such, I write respectfully to request a 30-day extension of Defendant’s time to respond to Plaintiff’s complaint, from January 27, 2021 to February 26, 2021. The requested additional time will afford the opportunity to review the underlying administrative record and billing records, upon which this matter is based. The parties are optimistic that this matter may be resolved through a negotiated settlement and, as such, the requested extension would permit the parties the necessary time to work toward this end. Plaintiff’s counsel, Kevin Mendillo, consents to this request.

In addition, we respectfully request a corresponding adjournment *sine die* of the initial conference scheduled for February 4, 2021, to a date after March 1, 2021, and that a civil case management plan be due no earlier than March 5, 2021.

We thank the Court for its time and consideration of this request.

January 26, 2021
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HOGUET NEWMAN
REGAL & KENNEY, LLP

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'L. Khoury', is positioned above the name Lillian Khoury.

Lillian Khoury

cc: VIA ECF
Kevin Mendillo
Cuddy Law Firm, P.L.L.C.
5693 South Street Rd.
Auburn, NY 13021
Attorney for Plaintiffs